



Stakeholders

General Purpose Agencies

City of Camarillo
City of Fillmore
City of Ojai
City of Oxnard
City of Port Hueneme
City of Moorpark
City of Santa Paula
City of Simi Valley
City of Thousand Oaks
City of Ventura
Ventura County Executive Office
Ventura County General Services Agency
Ventura County Resource Management Agency

Water Suppliers/Wastewater Management/ Special Districts

Calleguas Municipal Water District
Camarillo Sanitary District
Camrosa Water District
Casitas Municipal Water District
Fillmore Irrigation Company
Fox Canyon Groundwater Management Agency
Golden State Water Company
Ojai Basin Groundwater Management Agency
Ojai Valley Sanitary District
Ojai Valley Water Conservation District
Pleasant Valley County Water District
Saticoy Sanitary District
Triunfo Sanitation District
United Water Conservation District
Ventura County Watershed Protection District
Ventura County Waterworks Districts
Ventura Regional Sanitation District
Zone Mutual Water Company

Business Organizations

Building Industry Association
Farm Bureau of Ventura County
Ventura County Economic Development
Association

Recreational and Open Space Entities

California Department of Parks and Recreation
Conejo Recreation and Park District
Pleasant Valley Recreation and Park District
Rancho Simi Recreation and Park District
Santa Monica Mountains Recreation &
Conservation Authority

Regulatory Agencies

California Coastal Commission
California Department of Fish and Game
Los Angeles Regional Water Quality Control Board
U.S. Army Corps of Engineers
U.S. Environmental Protection Agency
U.S. Fish and Wildlife Service

Other Agencies/Organizations

Association of Water Agencies of Ventura County
California Coastal Conservancy
California Department of Transportation
California Department of Water Resources
California Native Plant Society
California Wildlife Conservation Board
Environmental Defense Center
Friends of the Santa Clara River
Hansen Trust
Matilija Coalition
Natural Resources Conservation Service
Nature Conservancy
Ojai Valley Land Conservancy
Point Mugu Naval Base
Santa Monica Mountains Conservancy
Surfrider Foundation
Trust for Public Land
U.S. Forest Service
Ventura County Resource Conservation District
Ventura Hillside Conservancy
Wetlands Recovery Project

August 24, 2012

Zaffar Eusuff

Division of Integrated Regional Water Management
Financial Assistance Branch – Department of Water Resources

Subject: Comments on Draft 2012 Proposition 84 and 1E Guidelines
and PSPs

Dear Mr. Eusuff:

Thank you for the opportunity to comment on the 2012 Draft Guidelines and PSPs for Proposition 84 IRWM and Proposition 1E Stormwater Flood Management Grant Programs. We appreciate the revisions made from the 2010 Guidelines and PSPs, taking into consideration the input from IRWM regions over the past year. We appreciate the effort made to simplify the benefits analysis and allow for more discussion of non-monetized benefits.

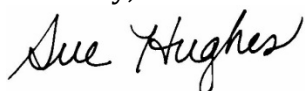
The Watersheds Coalition of Ventura County (WCVC) respectfully submits the following comments, which we have coordinated with our neighbors in the Upper Santa Clara River Watershed Integrated Regional Water Management Group:

- We strongly suggest past performance with IRWM grants be taken into consideration, particularly poor performance, as in the case of regions that have been unable to expend their previous grant funds in an expeditious and timely manner. Rather than giving extra points to regions that have performed well – which puts regions with no previous grant awards at a disadvantage – it might be more equitable to **deduct** points from those regions that do not have a good track record with their previous grants.
- Within the Proposal Solicitation Package (PSP), the cost benefit methodologies, we respectfully request that DWR allow projects with total costs of \$500,000 or less (rather than \$250,000 or less) to use the Cost-Effectiveness Analysis/Method D1. The proposed threshold of \$250,000 would exclude any infrastructure-type projects.
- Because grant funding under Proposition 84 is contingent upon having a groundwater management plan compliant with CWC §10753.7, DWR should consider making Groundwater Management Plan preparation an eligible project type for Proposition 84 Implementation funding.

- Regarding the requirement that all project proponents adopt the IRWM Plan, DWR should include some flexibility for non-traditional project proponents (e.g., small environmental groups) that do not have a typical organizational structure.
- Within the Draft Guidelines, page 16, it is unclear what eligibility criterion DACs and BMP projects are exempt from (it could be interpreted that these types of projects are exempt from all eligibility requirements).
- The Draft Guidelines and Draft PSP differ slightly in how they describe the funding match waiver for DAC's. The Draft Guidelines state that funding match will be "waived for project that directly address a critical water supply or water quality need for a DAC," whereas the Draft PSP states, "Projects that meet the needs of a DAC, the required 25% cost share may be waived." It is unclear if the waiver requires that the project address a critical water supply or water quality need of a DAC or just meet any DAC need.
- In general, it seems that the DACs would benefit from a simpler, more streamlined process for applying for funding. They could also use more technical assistance. It might make sense in future rounds of funding to have a separate process for those entities to access the set-aside funding directly, rather than through an IRWM region.
- Given the time it takes to put together a competitive application for funding, we also respectfully request that there be at least 5 to 6 months between the time the final guidelines and PSPs are released and the deadline for the application.
- The scoring criteria for the Stormwater Flood Management Implementation Grant suggests that phasing of projects is acceptable so long as each phase can be operated as a stand-alone project independent of future phases. We recommend that the grant program guidelines be revised to allow for the facilitation of large, multi-phased implementation projects even when the full benefits of the projects will not be realized until all phases of the projects are completed. This would be consistent with the spirit of integrated regional water management planning.
- It would greatly enhance the ability of project proponents to implement long-term, phased construction projects and would incentivize the submittal of integrated, multi-benefit regional projects if reimbursement was allowed as far back as the date of bond passage.

Thank you again for the opportunity to comment.

Sincerely,

A handwritten signature in black ink that reads "Sue Hughes". The signature is written in a cursive, flowing style.

Sue Hughes
Chair